## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS EL PASO DIVISION

UNITED STATES OF AMERICA,	§	
	§	
Plaintiff,	§	
	§	CRIMINAL NO. EP-25-M-02401-LE
<b>v.</b>	§	
	§	
ADELY VANESSA DE LA CRUZ-	§	
ALVAREZ,	§	
	§	
Defendant.	8	

## **UNITED STATES' LIST OF PROPOSED EXHIBITS**

Exhibit	Description	Offered	Admitted
Number	-		
1	Map of Area of Apprehension		
2	Kermit Williams Gate looking East		
3	Kermit William Gate looking South		
4	Kermit Williams Gate looking West		
5	Point of Entry		
6	Profile Photograph of Area of Apprehension		
7	Photograph of Levee		
8	NDA Sign		
9	I-213 (First Page)		
10	Photographs of Defendant's Passport (7 pages)		
11	Land Transfer Certificate of Records		
11-a	Land Dee History (89 pages)		
12	GSA Land Transfer (24 pages)		
12-a	Area of Apprehension		
13	GSA Land Holding (24 pages)		
12	Land Deed History (123 pages)		
13	Land Transfer to US Army (28 pages)		
14	Land Transfer to Fort Bliss		
15	Fort Bliss Order		
16	Color Photograph of Defendant		

## DATED this 2nd day of June, 2025.

Respectfully Submitted,

JUSTIN R. SIMMONS UNITED STATES ATTORNEY

By: /s/Phillip Countryman

Phillip Countryman Texas Bar 24094380 Assistant U.S. Attorney 700 E. San Antonio, Suite 200 El Paso, Texas 79901 (915) 534-6884

## **CERTIFICATE OF SERVICE**

I hereby certify that on June 2, 2025, a true and correct copy of the foregoing instrument was electronically filed with the Clerk of the Court using the CM/ECF System. A true copy of this sealed document will be provided to Defendant's Attorney.

/s/Phillip Countryman
Phillip Countryman
Assistant U.S. Attorney